REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 12-23 remain pending, claims 12, 14, and 15 being independent.

Prior Art Rejection

1. Section 102 Rejection: *Boyce*

Claims 12-17 and 20-21 stand rejected under 35 U.S.C. § 102 as allegedly being anticipated by *Boyce* (U.S. Patent 6,012,091). This rejection is respectfully traversed.

Independent claim 12 is directed to an image signal storage and reconstruction apparatus for receiving, storing and reconstructing a coded image signal fed from an image signal transmitting apparatus for use in a communication environment in which errors are likely to occur. The apparatus of claim 12 comprises: a storage and reconstruction control unit, which outputs an intra-frame request signal directing, in accordance with a request for storage, the image signal transmitting apparatus to transmit the coded image signal in which the entirety of an image is intra-frame coded, and also outputs a storage start signal for carrying out a storage starting operation; and a coded signal storage unit, which extracts, in accordance with the storage start signal, the information indicating the coding mode of the entirety of an image from the coded image signal transmitted from the image signal transmitting apparatus, and starts storing the coded image signal when it is detected that the input coding image is the one in which the entirety of an image is intra-frame coded.

In rejecting claim 12, the Office Action cites a controller 100 and a frame storage unit 320 (Fig. 4) of *Boyce* as allegedly corresponding to the storage and reconstruction control unit and coded signal storage unit of claim 12, respectively. See Office Action, page 3. As discussed

in the Reply dated February 22, 2005, *Boyce* discloses a video coder used in a video telecommunication server environment, e.g., for use in video phone services. In the system of *Boyce*, as illustrated in Fig. 1, encoded video data is decoded and re-encoded in a format that allows a server 20 to provide fast forward capability in response to requests from the user's video decoder apparatus. See e.g., col. 6, lines 47-60. In the embodiment cited in the Office Action as being relevant to claim 12, this is achieved by providing intra-coded frames in response to a fast forward command. See e.g., col. 10, lines 1-4. As discussed at col. 10, lines 18-20, the server 20 may periodically request that a caller's encoder 10 transmit an intra-coded frame.

Applicants submit, however, that *Boyce* fails to teach an image signal storage and reconstruction apparatus as claimed, in which a coded signal storage unit (allegedly corresponding to frame storage unit 320 of *Boyce*) extracts, in accordance with a storage start signal, information indicating the coding mode of the entirety of an image from the coded image signal and starts storing the coded image signal upon detecting that the input coding image is one in which the entirety of an image is intra-frame coded. At least for this reason, *Boyce* fails to anticipate independent claim 12, or any claim depending therefrom.

Independent claim 14 is directed to an image signal transmission apparatus for transmitting a coded image signal for use in a communication environment in which errors are likely to occur. The apparatus of claim 14 comprises: an image coding unit for coding an input image signal and transmitting the thus coded image signal to an image signal storage and reconstruction apparatus; and a coding control unit which receives an intra-frame request signal sent from the image signal storage and reconstruction apparatus and detects frequency of error occurrences, so as to control the frequency of the coded intra-frame coded image signal in which

the entirety of an image is intra-frame coded, in accordance with the frequency of the intra-frame request signal and that of the error occurrences.

Thus, the transmission apparatus of claim 14 controls the frequency of transmitting intra-frame coded images in which the entirety of an image is intra-frame coded in accordance with the frequency of received intra-frame request signals and the detected frequency of error occurrences.

In rejecting claim 14, the Office Action cites the video encoder 410 (Fig. 4) of *Boyce*, which is capable of encoding extra I frame data for facilitating fast forward/reverse capability in response to a user's request. See Office Action, page 3. Applicants respectfully submit, however, that the video encoder 410 of *Boyce* does not perform the above-noted functions of the coding control unit recited in claim 14, which controls the frequency of transmitting coded intra-frame data in which the entirety of an image is intra-frame coded in accordance with a detected frequency of error occurrences and intra-frame request signals. At least for this reason, *Boyce* fails to anticipate independent claim 14, or any depending therefrom.

Independent claim 15 is directed to an image signal storage and reconstruction apparatus for receiving, storing, and reproducing a coded image signal for use in a communication environment in which errors are likely to occur. The apparatus of claim 15 comprises: a storage and reconstruction control unit, which transmits a reconstruction start signal directing the start of reconstruction of the coded image signal stored in a coded signal storage unit, in accordance with a request for reconstruction, and an image decoding unit, which extracts, in accordance with the reconstruction start signal, the information indicating the coding mode of the entirety of an image from the coded image signal output from the coded signal storage unit, and starts

reconstructing the coded image signal when it is detected that the input coding image is the one in which the entirety of an image is intra-frame coded.

In rejecting claim 15, the Office Action refers to the reasoning presented for rejecting claim 12. See Office Action, page 4. For reasons set forth above, the asserted grounds of rejection fails to establish anticipation of claim 12, and likewise fails to establish anticipation of claim 15 based on similar reasoning. At least for this reason, Applicants submit that *Boyce* fails to anticipate claim 15, or any claim depending therefrom.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection under 35 U.S.C. § 102.

2. Section 103 Rejection: *Boyce – Isu*

Claims 18-19 and 22-23 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over *Boyce* in view of *Isu et al.* (U.S. Patent 6,862,320). This rejection is respectfully traversed.

As set forth on pages 4-5 of the Office Action, the Examiner relies on the secondary reference, *Isu*, as allegedly pertaining incremental features of the above-listed dependent claims. The Examiner's reliance on *Isu*, however, fails to make up for the deficiencies of *Boyce* discussed above with respect to the independent claims currently pending in the present application. Accordingly, the asserted combination (assuming these references may be combined, which Applicants do not admit) fails to establish *prima facie* obviousness of any pending claim.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection under 35 U.S.C. § 103.

Conclusion

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

By _____

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